

Center for Medicaid and State Operations/Survey and Certification Group

Ref: S&C-04-30

DATE: May 13, 2004

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Clarification of the Scoring for Measure 5 (Medication Investigation) of the Federal Oversight Support Survey (FOSS) Protocol for Long Term Care (LTC)

Letter Summary

- The FOSS is one of two evaluative survey methods used by the Centers for Medicare & Medicaid Regional Offices.
- Measure 5 of the FOSS Protocol is based on the State Survey Agency (SA) Team's effectiveness in the identification of medication errors in facilities.
- Scoring for this measure is being clarified.

Background

The Medications Investigation Measure of the FOSS Protocol focuses on how effectively the SA team identifies whether the facility's preparation and administration of medications complies with requirements. During the FOSS training in February and March 2004, clearer descriptions of behaviors required for rating scale levels were provided to those in attendance. In order to ensure that the SA receives a fair rating, this memorandum will serve as the interim policy until a revised FOSS Evaluator manual can be issued.

Discussion

The Medications Investigation requires the accurate identification of all medication errors, the observation of two passes (if an error is discovered during the initial pass), and the other criteria as defined in Appendix P and memorandum S&C-03-24 including:

- Observation of multiple individuals administering medications within the minimum of 20-25 opportunities;
- Observation of as many different routes of administration as possible within the minimum of 20-25 opportunities; and
- Observation of opportunities involving residents with care needs that are representative of the sample or the actual sampled residents within the minimum of 20-25 opportunities.

The scoring of Measure 5 is based on the SA's performance in the above stated areas. This memorandum seeks to clarify the scoring requirements that were newly introduced during FOSS training.

In order for the SA team to receive a level of '5', they:

- Identify all medication errors,
- Correctly calculate the medication error rate, and
- Perform a two-pass process (if required).

In addition, they must observe multiple individuals administering medications, observing as many different routes of administration as possible, **and** observing opportunities involving residents with care needs that are representative of the sample or the actual sampled residents.

In order for the SA team to receive a level of '3', they:

- Identify all medication errors,
- Correctly calculate the medication error rate, and
- Perform a two-pass process (if required).

In addition, they must make efforts to observe multiple individuals administering medications, observing as many different routes of administration as possible, **or** observing opportunities involving residents with care needs that are representative of the sample or the actual sampled residents.

The identification of all medication errors is the determining criteria between ratings of performance equivalent to a level '3' and performance equivalent to a level '2'. **All medication errors must be accurately identified regardless of the medication error rate in order to receive a score of '3' on Measure 5.**

For questions concerning this memo, please contact Dawn Hawkins Johnson at (410) 786-1117 or e-mail at dhawkinsjohnson@cms.hhs.gov.

Effective Date: Immediately.

Training: The information contained in this announcement should be shared with all surveyors, survey and certification staff, their managers, and the state/RO training coordinators.

/s/
Thomas E. Hamilton

cc: Survey and Certification Regional Office Management (G-5)